

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. MENOLD, Individually and) Civil Action No. 1:16-cv-00075-GMS
on Behalf of All Others Similarly Situated,)

Plaintiff,) _____

VS.

NAVIANT CORPORATION, et al.,

Defendants.

Civil Action No. 1:16-cv-00075-GMS

CLASS ACTION

Defendant

Civil Action No. 1:16-cv-00084-GMS

CLASS ACTION

Plaintiff,

VS.

NAVIANT CORPORATION, et al.,

Defendants.

POLICEMEN'S ANNUITY & BENEFIT
FUND OF CHICAGO, Individually and on
Behalf of All Others Similarly Situated,

Civil Action No. 1:16-cv-00112-GMS

CLASS ACTION

Plaintiff,

VS.

NAVIANT CORPORATION, et al.,

Defendants.

DECLARATION OF NORMAN M. MONHAIT IN SUPPORT OF THE MOTION OF
THE CITY OF MIAMI FIRE FIGHTERS' AND POLICE OFFICERS' RETIREMENT
TRUST FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF SELECTION OF COUNSEL

I, Norman M. Monhait, declare as follows:

1. I am an attorney duly licensed to practice before the courts of the State of Delaware and this Court. I am a member of the law firm of Rosenthal, Monhait & Goddess, P.A. (“Rosenthal Monhait”), Local Counsel for proposed Lead Plaintiff The City of Miami Fire Fighters’ and Police Officers’ Retirement Trust (“Miami Retirement Trust”). I make this declaration in support of Miami Retirement Trust’s Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Robbins Geller Rudman & Dowd LLP (“Robbins Geller”) as Lead Counsel.

2. Attached hereto are true and correct copies of the following exhibits:

Exhibit A: Miami Retirement Trust’s sworn Certification;

Exhibit B: Chart of Miami Retirement Trust’s Estimated Losses, prepared by counsel;

Exhibit C: Notice of pendency of class action published on *PR Newswire*, a national business-oriented wire service, on February 12, 2016;

Exhibit D: Robbins Geller Rudman & Dowd LLP firm resume.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 11th day of April, 2016, at Wilmington, Delaware.

/s/ Norman M. Monhait

NORMAN M. MONHAIT